

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

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CREATIVE PHOTOGRAPHERS, INC.,

Plaintiff,

v.

JULIE TORRES ART, LLC,  
JULIE TORRES,  
MAUNE CONTEMPORARY, LLC, and  
INTERNATIONAL FINE ART  
DIRECT, LTD.

Defendants.

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Civil Action No.:  
1:22-cv-00655-JPB

**DECLARATION OF GEOFF KATZ**

I, Geoff Katz, hereby declare as follows:

1. I am above eighteen (18) years of age and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge. I make this declaration in support of Plaintiff's Memorandum of Law in Opposition to Defendants Julie Torres Art, LLC and Julie Torres' Motion to Dismiss Plaintiff Creative Photographers, Inc.'s First Amended Complaint. If called as a witness, I could and would competently testify as set forth below.

2. I am the founder of Plaintiff Creative Photographs Inc. ("CPI") in this action. CPI is a premier photographic syndication, licensing, and sales company based in New York and it distributes to media outlets and publications photographs of models and celebrities created by internationally renowned photographers, including Richard Corman, Zoey Grossman, Patrick Hoelke, Jeff Lipsky, Mary Ellen Matthews, Robert Maxwell, Vijat Mohindra, Nino Munoz, Frank Ockenfels III, and Ruvén Afanador ("Afanador").

3. By virtue of its contracts with its photographers, CPI is the sole and exclusive distributor for Afanador's photographs ("Works"). **Exhibit 3a of Plaintiff's First Amended Complaint** is

a true and correct copy of the contract between CPI and Afanador (“Agreement”). Afanador owns the copyrights in the Works and Afanador has entered into an exclusive distribution and agency agreement with CPI. The Agreement establishes CPI had the sole right to distribute, license, and sell the Works to third parties. The Agreement also establish that CPI has, at all times relevant to this action, been the exclusive administrator and of all copyright rights in and to the Works.

4. CPI regularly licenses its photographers’ images, including Works, to third parties for a variety of uses including editorial, advertising, commercial, and governmental purposes. I have attached as **Exhibit 1** a true and correct copy of a license for an Afanador photograph (Margaret Atwood) to Canada Post HQ for use on a postage stamp.

Executed on April 20, 2022 in New York, New York.

By:   
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Geoff Katz  
Declarant